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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

AEDES DE VENUSTAS, INC.,	:	
Plaintiff,	:	
v.	:	Civil Action No.: 1:07-04530 (LTS)
VENUSTAS INTERNATIONAL, LLC,	:	ANSWER
Defendant.	:	

Venustas International, LLC, for its Answer to the Complaint, herein states as follows:

NATURE OF ACTION

1. Admitted.

THE PARTIES

2. Defendant has insufficient information available to it to either admit or deny the allegations of paragraph 2, and so Defendant denies same, leaving Plaintiff to its proofs.

3. Admitted.

JURISDICTION AND VENUE

4. Admitted.

5. Defendant admits it maintains an office in the judicial district and is transacting business in the State of New York, but otherwise denies the allegations of paragraph 5.

6. Admitted.

COUNT ONE

Infringement of a Federally Registered Trademark
Under 15 U.S.C. §1114

7. Defendant has insufficient information available to it to either admit or deny the allegations of paragraph 7 and therefore denies same, leaving Plaintiff to its proofs.

8. Defendant has insufficient information available to it to either admit or deny the allegations of paragraph 8 and therefore denies same, leaving Plaintiff to its proofs.

9. Defendant has insufficient information available to it to either admit or deny the allegations of paragraph 9 and therefore denies same, leaving Plaintiff to its proofs.

Defendant's Wrongful and Unlawful Use
Of Aede De Venustas Trade name and Trademark

10. Defendant admits that it uses the business name Venustas International, LLC in its business, but otherwise denies the allegations of paragraph 10.

11. Defendant admits that it has adopted and used the business name Venustas International, LLC in its business, but otherwise the allegations of paragraph 11.

12. Admitted.

13. Defendant denies that any telephone calls received by the Plaintiff are evidence of actual confusion between the Plaintiff's trademark and the Defendant's company. With regard to the remainder of that paragraph, Defendant has insufficient information available to it to either admit or deny the allegations of paragraph 13 and therefore Defendant denies same, leaving Plaintiff to its proofs.

14. Defendant admits that attached as Exhibit 4 to the Complaint are two invoices from Language Works which appear to have been addressed to "Ms. Ellen Manger, Venustas International, LLC, 9 Christopher Street, New York, New York 10014." Defendant denies that the invoices are evidence of actual confusion between Plaintiff's trademark and Defendant's business name. With regard to the remaining allegations of paragraph 14, Defendant has insufficient information available to it to either admit or deny those allegations and therefore denies same, leaving Plaintiff to its proofs.

15. Admitted.

16. Admitted.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

22. Denied.

23. Denied.

COUNT TWO

False Designations of Origin and
False Representations and Unfair Competition
Under 15 U.S.C. §1125(a)

24. Defendant repeats and realleges its answers to paragraphs 1-23 of the Complaint as if same were set forth at length herein.

25. Denied.

26. Denied.

COUNT THREE

Federal Dilution Under 15 U.S.C. §1125(c)

27. Defendant repeats and realleges its answers to paragraph 1-26 of the Complaint as if same were set forth at length herein.

28. Denied.

29. Denied.

30. Denied.

COUNT FOUR

Trademark Infringement and Unfair Competition
Under New York Law

31. Defendant repeats and realleges its answers to paragraphs 1-30 of the Complaint as if same were set forth at length herein.

32. Denied.

33. Denied.

COUNT FIVE

**Injury to Business Reputation
And Dilution Under New York Law**

34. Defendant repeats and realleges its answers to paragraphs 1-33 of the Complaint as if same were set forth at length herein.

35. Denied.

36. Denied.

COUNT SIX

**Deceptive Trade Practices
Under New York Law**

37. Defendant repeats and realleges its answers to paragraphs 1-36 of the Complaint as if same were set forth at length herein.

38. Denied.

39. Denied.

PRAYER FOR RELIEF

Wherefore,

1. Defendant Venustas International, LLC respectfully requests judgment be entered in its favor and prays that this Court deny Plaintiff's claim for injunctive relief and damages.

2. That the court award Defendant its costs, disbursements and reasonable attorneys fees incurred in defending this action.

3. That the Court award Defendant such other and further relief as the Court may deem just and proper.

Respectfully submitted:

Dated: June 28, 2007

BY: s/ Robert G. Shepherd
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